

## **Title IV-A Technical Assistance**

**Updated January 14, 2019**

### **New!**

#### **What constitutes a mental health assessment or service?**

Under Title IV-A, Parents Right to Know, districts are required to get active parental/guardian consent for mental health assessment and services funded with Title IV-A dollars. Mental Health Services include assessment/screening, diagnosis, treatment and therapy to assist an individual or group in alleviating mental or emotional illness, symptoms, conditions, or disorders.

Within comprehensive school mental health, licensed pupil services professionals may, without active consent, support individual or groups of students in increasing access, progress and engagement in the general education curriculum. DPI strongly recommends schools personally engage with families for any supports provided to students beyond what is traditionally provided within the general education curriculum. This guidance supports, but does not supplant guidance from the Protection of Pupil Rights Amendment. Additional resources can be found here:

School Mental Health <https://dpi.wi.gov/sspw/mental-health>  
Mental/Behavior Health Screening <https://dpi.wi.gov/sspw/mental-health/mental/behavioral-health-screening>

Consent and Notification in a Multilevel System of Support -  
<https://dpi.wi.gov/sites/default/files/imce/sped/pdf/rti-consent.pdf>

#### **Can funds be used to purchase universal screeners?**

While universal screeners are an allowable expenditure, the vast majority would need to be coded under technology infrastructure as they are a staff data tool. Note that if the universal screener purchased with Title IV-A funds assesses for mental health, ESEA 4001(a)(1) requires districts to get active parental consent.

#### **What is meant by effective use of technology?**

This section of the grant is focused on building district/school capacity around blended and personalized learning and data through professional development or professional learning communities.

#### **What is meant by technology infrastructure?**

Examples of technology infrastructure include staff ipads, universal screeners and district/staff data collection tools. While these purchases may be allowed, they are required to be supported with professional development or a professional learning community to maximize use of the resource within the district. This support should be coded under the effective use of technology/data section, which is then used to calculate the 15% cap in WISEgrants.

There is a 15 percent technology spending cap for devices, equipment, software, and digital content. 20 U.S.C. § 7119(b).

A Special Rule in the SSAE program states that no more than 15 percent of funds for activities to support the effective use of technology may be used "for purchasing technology infrastructure as described in subsection (a)(2)(B), which includes technology infrastructure purchased for the

activities under subsection (a)(4)(A)." To clarify, LEAs or consortiums of LEAs may not spend more than 15 percent of funding in this content area on devices, equipment, software applications, platforms, digital instructional resources and/or other one-time IT purchases. (ESEA section 4109(b)).

Technology infrastructure is not broadband, building hardware, security cameras, routers, hotspot service plans etc. These items are not allowable under Title IV-A.

### **Application Questions**

#### **How do I find the Non-Regulatory Guidance Student Support and Academic Enrichment (SSAE) Grants?**

Non-regulatory guidance from the U.S. Department of Education on student support and academic enrichment grants can be accessed at:

<https://www2.ed.gov/policy/elsec/leg/essa/essassaegrantguid10212016.pdf>.

A Title IV-A website from the DPI is also available and can be accessed at:

<https://dpi.wi.gov/titleiva>.

#### **Where do I find my district allocation?**

A spreadsheet with district allocations for all Titles can be found at:

<https://dpi.wi.gov/titleiva/district-funding-allocations>.

#### **What is the current School District Project Period?**

The school district project period is July 1, 2018–June 30, 2019.

#### **Is carryover allowed?**

Title IV-A has unlimited carryover for 2018-19.

The Tydings Amendment applies to formula funds, like Title IV-A. 20 U.S.C. § 1225. For example, if a district received \$10,000 of Title IV-A funding to spend from July 1, 2017–June 30, 2018, and they only obligate and claim \$8,000 during that time period, the Tydings Amendment allows the district to carryover \$2,000 to spend between July 1, 2018, and September 30, 2019. This carryover amount is added into WISEgrants by the accountants after the district sends in their final claim from the July 1, 2017–June 30, 2018, time period. Carryover is used prior to the new 2018-19 allocation.

#### **Is a district required to accept Title IV funds?**

No, districts are not required to accept Title IV funds.

#### **What project code should we be using?**

The WUFAR **source** code will be 730 and the WUFAR **project** code will be 381.

#### **What are the requirements for districts receiving an allocation of \$30,000 or more?**

A district receiving an SSAE program allocation of at least \$30,000 must conduct a comprehensive needs assessment prior to receiving its allocation and subsequent needs assessments at least once every three years, to examine its needs for improvement of:

1. Access to, and opportunities for, a well-rounded education for all students;
2. School conditions for student learning to create a healthy and safe school environment; and
3. Access to personalized learning experiences supported by technology and professional development for the effective use of data and technology.

20 U.S.C. § 7116 (d).

Additionally, such districts must allocate funds as follows:

1. At least 20 percent of funds must be used to support one or more of the activities pertaining to well-rounded educational opportunities;
2. At least 20 percent of funds must be used to support one or more activities pertaining to safe and healthy students; and
3. A portion of funds must be used to support one or more activities pertaining to the effective use of technology, including an assurance that if the remaining amount is used under effective use of technology, it will not use more than 15 percent of that amount for purchasing technology infrastructure.

20 U.S.C. § 7116(e)(2)(C)-(E).

**If a district receiving \$30,000 or more is part of a consortium, do all the districts in the consortium have to conduct a needs assessment?**

In a consortium under Title IV-A, participating districts combine the funds each district in the consortium receives to jointly carry out Title IV-A activities. 20 U.S.C. § 7115(a)(3). If a district is part of a consortium, and the consortium receives \$30,000 or more, the consortium must do a needs assessment of all the districts proposed to be served. 20 U.S.C. § 7116(d)(1).

**What are the requirements for districts receiving an allocation less than \$30,000?**

Districts receiving less than \$30,000 are not required to conduct a comprehensive needs assessment. 20 U.S.C. § 7116(d)(2). Such districts are only required to focus on one of the three SSAE content areas: well-rounded educational opportunities, safe and healthy students, or effective use of technology. 20 U.S.C. § 7116(f).

**Must a district distribute SSAE program funds to each of its schools?**

No. An LEA or a consortium is not required to distribute SSAE program funds to each of its schools. A district or a consortium must prioritize the distribution of funds to schools as described in the “Assurances” section of the district or consortium’s application for funds. In prioritizing the distribution of funds, a district that provides district-wide services with the SSAE program funds must focus those services on schools that, in addition to other considerations, are among the schools with the greatest needs as determined by the district or consortium. 20 U.S.C. § 7116(e)(2)(A).

**If we are a Title I school at the elementary or middle school level, are we required to select activities at these levels for Title IV-A?**

While Title I is used to determine district allocations for Title IV-A, activities for Title IV-A can be used for allowable expenditures at any level. Districts with allocations over \$30,000 are required to do a comprehensive needs assessment that addresses the three major areas of the Title, well-rounded educational opportunities, safe and healthy students, and effective use of technology, to identify areas of highest need.

**Is stakeholder input required?**

Yes, during the design and development of its application, a district or consortium must engage in consultation with stakeholders in the area served by the district. Such stakeholders must include, but are not limited to, the following:

- Parents
- Teachers
- Principals
- Students
- School leaders
- Charter school teachers, principals, and other school leaders, when applicable
- Specialized instructional support personnel
- Indian tribes or tribal organizations, when applicable
- Local government representatives
- Others with relevant and demonstrated expertise
- Community-based organizations

20 U.S.C. § 7116(c)(1).

A district or consortium must continue to consult with the stakeholders identified above to improve the activities it conducts and to coordinate implementation with other related activities conducted in the community. 20 U.S.C. § 7116(c)(2).

**Can the funds be used to purchase computers?**

Yes, if they are being used for direct student instruction under areas of well-rounded education.

**Explain the supplement not supplant requirement.**

In considering how to use SSAE program funds, districts should be mindful that SSAE program funds may be used only to supplement, and not supplant, non-federal funds that would otherwise be available for activities authorized under the SSAE program. 20 U.S.C. 7120.

This means that, in general, *districts may not use SSAE program funds for the cost of activities in the three SSAE program content areas – well-rounded education, safe and healthy students, and technology – if the cost of those activities would have otherwise been paid with state or local funds in the absence of the SSAE program funds.*

**Can these funds be used to support homeless student activities (McKinney-Vento) such as fees and transportation?**

Allowable expenditures that would support homeless students might include AP fees or the purchase of or training on an evidence-based program such as *Street Smart*.

**Is transportation an allowable expenditure?**

Transportation as it relates to an allowable activity within well-rounded education, safe and healthy students and effective use of technology is allowed. The cost of transportation must also be reasonable and necessary for performance of the grant.

Bussing costs for the regular school day are not allowable under Title IV-A.

**Can school districts use Title IV-A funds to bring in a provider to administer mental health services to students who have experienced trauma?**

Yes. There are a variety of health and mental health services that may be provided with Title IV-A funds. All activities paid for with federal funds must be aligned to meeting one or more of the school district's identified needs. 20 U.S.C. § 7118. ESEA 4001(a)(1) requires active parental consent for mental health assessments and services provided with Title IV-A funds.

**Transfers**

**How long does transfer approval take?**

Districts must give the DPI a 30-day notice when transferring funds. Contact Emily Holder at [emily.holder@dpi.wi.gov](mailto:emily.holder@dpi.wi.gov) or 608-267-9170 to discuss the District's intent.

**If a school district transfers all of its Title IV-A funds into Title I-A, this creates a new Title I-A total. Does the amount of Title I-A funds reserved for private schools get calculated using the new total after the transfer of funds?**

Yes. The amount used to provide equitable services to nonpublic school students and personnel must be determined based on the total amount of funding available after the transfer of any funds.

**Do districts need to consult with private schools before they transfer funds to another Title?**

Yes, but the public school district holds the authority to transfer the dollars.

**What happens to the dollars if the public school transfers funds from Title IV-A to Title I-A?**

The funds "become" Title I-A and the Title I-A equitable participation rules apply. Keep in mind that if a district transfers only some of Title IV-A funds, the amount of funds remaining in Title IV-A are subject to the Title IV-A equitable participation rules. Given that Title IV-A is such a broad Title, no transfer may be necessary if the intended activities are also allowable under Title IV-A.

**Consortia**

**If a school district joins a Title IV-A consortium and the total consortium allocation is above \$30,000, do the spending rules and restrictions regarding allocations of that amount pertain to the consortium?**

Yes, the same rules apply. The rules are contingent upon the allocation amount only, regardless of whether received by an individual school district or consortium. 20 U.S.C. § 7115(a)(3).

**If there is one fiscal agent that applies for money on behalf of a consortium, does that fiscal agent or applying district then distribute the money to other districts?**

The lead agency (fiscal agent) of the consortium applies for the funds on behalf of the consortium. The lead agency provides the services to the consortium participants and does not distribute any funds to the consortium members. Every consortium must have a Memorandum of Understanding (MOU) that includes a list of all consortium members with signatures of the superintendents of the districts in the consortium and lists the responsibilities of the lead agency (fiscal agent) and participating agencies.

## **Private Schools and Equitable Participation**

### **How do I calculate the allocation for private schools?**

Under Title IV-A, districts must provide for the equitable participation of private school students, teachers, and other educational personnel in private schools located in areas these agencies serve in Title IV-A-funded activities, including engaging in timely and meaningful consultation with private school officials during the design and development of their Title IV-A programs. 20 U.S.C. § 7881. A calculator can be found at <https://dpi.wi.gov/titleiva/equitable-participation>. Information necessary to complete this form includes your district administrative costs (up to 2 percent of the allocation), district enrollment, and total enrollment of private schools choosing to participate in Title IV-A.

### **Do the same rules as Title I and II apply to Title IV-A (i.e. districts can't directly pay the private school)?**

Yes, anything on the ESEA page applies to all titles <https://dpi.wi.gov/esea>. Private schools can receive support by contacting [ESSAombudsman@dpi.wi.gov](mailto:ESSAombudsman@dpi.wi.gov).

### **Do districts need to consult with only private schools in their boundaries, or with any private schools with one of their students in attendance?**

Districts are only required to consult with private schools in their boundaries. Students who reside within your district's boundaries but attend schools in a neighboring district are serviced by the district they attend under Title IV-A.

### **If a district chooses to surrender their Title IV allocation, is the private school entitled to their equitable share?**

There will not be an equitable share for the private schools because the equitable share would be a share of a \$0 allocation.

### **If the district chooses to transfer their Title IV allocation, what is the equitable share?**

Transferred funds then become part of the receiving Title's allocation and are no longer Title IV funds. The equitable share would come out of the receiving Title.

### **Can private schools choose activities that are different than the public school?**

Yes, private school activities do not have to match the public schools as long as they are allowable.

### **Can we buy materials for the private school related to the allowable activities (well-rounded educational opportunities, safe and healthy schools, effective use of technology)?**

Yes, but they remain the property of the district.

### **Can the dollars support certified staff from either the public or private school related to the allowable activities?**

This funding can be used to fund staff at the public school as long as the funded staff person is appropriately aligned with allowable activities. Funds can only be used to supplement. They cannot supplant.

For private schools, funded public school staff can provide the requested service directly or a separate entity can be contracted to provide the service for the private school.

**If we are managing funds for private schools, is it our responsibility to make sure activities are allowable?**

All budgeted activities must be allowable to make it through the DPI approval process. Use the application to explore available WUFAR codes.

**Guidance says that we can't use more than 15 percent of allocation for technology infrastructure. Is this true for a private school also, or can they spend more than 15 percent of their allocation on technology infrastructure?**

The 15 percent cap applies to private schools as well.

**How do we determine student count?**

Third Friday count, which is the enrollment on the third Friday in September, is commonly used, but not required. However, the method of determining student count should be consistent across Titles.

**What percentage can districts hold for administrative costs?**

Districts may reserve no more than 2 percent of funds for administrative costs. 20 U.S.C. § 7115(c).

**Will private school funds and public funds be rolled over into separate "pots of money" in the future?**

If a plan is put in place for a private school and the funds remain unspent (i.e. staff didn't participate in the chosen training), the private school dollars will carryover separate from the public school dollars.

**WISEgrants Technical Assistance**

**Why can't I find the Admin menu in WISEgrants?**

Only the WISEgrants Administrator for your district will see the Admin menu. Users with Viewer Access accounts will not have access to this menu. For additional information, please visit:

<https://dpi.wi.gov/wisegrants/technical-assistance#access>.